

January 27, 2024

RAFIYQ DAVIS
4208 Parkside Ave
Phila, PA 19104

To: United States District Court
For The Eastern District of Pennsylvania
601 Market Street
Phila, PA 19106

RE: Filing this Complaint

Dear

Hi, I am Filing this Complaint with the United States District Court For the Eastern Court For The State of Pennsylvania. Please File this Complaint.

Also, I would like A copy of AN Informa Pauperis Form sent ~~to~~ me At: ———

↓
RAFIYQ DAVIS
4208 Parkside Ave
Phila, PA 19104

Respectfully,


RAFIYQ DAVIS

RAFIYQ DAVIS

V.

Septa Transit Police Officer Schermerhorn
Septa Transit Police Officer John Doe
Septa
City of Philadelphia
State of Pennsylvania

Civil Action No.

☒ JURY

☒ NON JURY

Individual Capacity And Official Capacity

Parties In The Complaint

1. Plaintiff: RAFIYQ DAVIS
4208 Parkside Ave
Phila, PA 19104

2. Defendants: Septa
1234 Market Street
Phila, PA 19107

6. State of Pennsylvania
1101 South Front St
Harrisburg, PA 17104

3. Septa Transit Police Officer Schermerhorn
1234 Market Street
Phila PA 19107

4. Septa Transit Police Officer John Doe
1234 Market Street
Phila, PA 19107

5. City of Philadelphia
1515 Arch Street
Phila, PA 19102

CITY HALL
City of Philadelphia
AND 1500 John F. Kennedy Blvd.
Phila, PA 19102

COMPLAINT

1. On 12/19/2023, I was assaulted and slammed to the Ground by Two Septa Police Officers, Police Officer Schermerhorn Badge # 251, and Police Officer John Doe Badge # 228, while waiting on the Broad Street Line at Broad Street and Locust Streets At around 7:00 pm. I suffered injuries.
2. This was Excessive use of Force, Abuse of Authority, ~~Brutality by Police~~, violation of my equal protection Rights, violation of my Right To Travel, Illegal Detention, Assault, unlawful restraint, Pain and suffering, ETC, resulting in injuries, bleeding gashes, cut, and marks, back, wrist, neck injuries as well as others ~~and~~ including hand and finger injuries.
3. After the Assault / being Attacked by officers, they handcuffed me extra tight leaving cuff markings around my wrists. They then searched my pocket for my Identification Card. I was under duress. They then took a picture of my state identification Card, A picture of my face and also took a finger print with their cell phone.
4. They then Stated they were banning me From riding Septa After they released me minutes later After they Attacked me.
5. Illegal Fingerprinting, illegal picturing of my identification Card,
6. There was No investigatory stop **NOR Questioning**
7. The Fourth Amendment prohibits police officers From using excessive Force when arresting someone. It also prohibits police officers From unreasonable seizures. A seizure can include an arrest or detention of someones person or body. The Fourth Amendment is an essential tool to protect citizens From the police department ~~using~~ abusing its power. Any Method used by Law enforcement to stop someones movement can constitute A seizure under the Fourth Amendment. Not only did the officers attack me, assault me, and slam me down to the ground and ~~place my body in unusual holds and twistists~~ ~~and~~ they went into my pockets. Their Attacks caused me pain, cuts, scrapes and bruising, etc.

8. LAW Enforcement Misconduct Statute 42 U.S.C. §14141 (Re-codified at 34 U.S.C. 12601)
(A) Unlawful conduct states "It shall be unlawful for any governmental Authority, or agent ~~thereof~~ thereof, or any person acting on behalf of a governmental authority, to engage in a pattern or practice of conduct by law enforcement officers that deprives persons of rights, privileges, or immunities secured or protected by the Constitution or laws of the United States,

These officers stopped me from getting on the train and going where I needed to go and attacked me, which deprived me / ~~me~~ refused me my rights to travel. ~~me~~

8(A). The State of Pennsylvania employs these people / officers / ~~me~~ where the matters in this complaint occurred.

9. These officers abused their Authority by attacking me, assaulting me, and by slamming me down to the ground and made threats of tasing me.

10. The City of Philadelphia employs these people as officers / Transit officers where the matters in this complaint occurred.

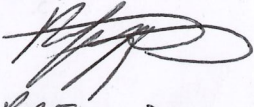
Relief:

1. Compensatory, Monetary

2. Further Relief is sought

01/27/2024

Respectfully,


KAFIYQ DAVIS

In The United States District Court
For The Eastern District of Pennsylvania

RAFIYQ DAVIS

V.

septa Transit Police officer Shermerhon, et al

Civil Action No.

Certificate of Service

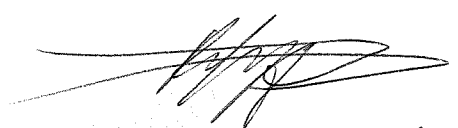
I, RAFIYQ DAVIS, hereby certify that on this 27th day of January, 2024
A complaint/Civil Action was Filed and sent to the Following Address via First
Class mail:

Complaint Filings Unit
Office of The Clerk
United States District Court
Eastern District Court For The
State of Pennsylvania
601 Market Street

Phila, PA 19106

Respectfully,

01/27/2024


RAFIYQ DAVIS
4208 Parkside Ave
Phila, PA 19104



JAN 31 2024

Needs
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United States District Court
Eastern District Court For The
State of Pennsylvania
601 Market Street
Phila, PA 19104

RAFIYO DAVIS
4208 PARKSIDE AVE
PHILA, PA 19104

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